

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Aaron Abadi,)	
)	
Plaintiff,)	DECLARATION OF MOON, HYE
)	JIN IN SUPPORT OF KOREAN AIR
vs.)	LINES CO., LTD.'S MOTION TO
)	DISMISS
American Airlines Group, Inc., <i>et al.</i> ,)	
)	
Defendant.)	Civil Action No. 1:23-cv-04033-LJL

I, Moon, Hye jin, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.
2. I am the General Manager of Korean Air Lines Co., Ltd. ("Korean Air") with a business address of 3rd Floor, Prima 2, Prima Avenue, Jalan Teknokrat 5, 63000 Cyberjaya, Selangor, Malaysia, and have been employed in this position since April 2021.
3. My duties and responsibilities include managing the Korean Air Global Service Centre's contractor in Malaysia.
4. As the General Manager, I am fully familiar with Korean Air's corporate structure as well as records, databases standard practices regarding the ticketing of passengers transported by Korean Air and the Korean Air Global Service Centre.
5. I submit this Declaration in support of the Korean Air Motion to Dismiss.
6. I am fully familiar with the facts and allegations contained in Plaintiff's Complaint and Supplemental Complaint and submit this Declaration based upon my personal knowledge except where I have stated facts to be based upon information and belief, my review

of the records of Korean Air that are created and maintained in the regular course of its business and the Complaint and Supplemental Complaint filed by Plaintiff in this action.

7. As to facts based upon information and belief, I believe them to be true based upon information given to me by employees of Korean Air, or through documents which I have reviewed in the course of my duties.

8. Korean Air is a Republic of Korea air carrier and engaged in the business of the carriage by air of passengers, baggage and cargo.

9. Korean Air is a corporation organized and exists under the laws of the Republic of Korea.

10. Korean Air maintains its headquarters and principal place of business in Seoul, Republic of Korea.

11. Korean Air has never maintained a principal place of business in any state in the United States, including New York or Texas.

12. On November 18, 2021, one of the contractor employees of Korean Air Global Service Centre responded to an e-mail from Aaron Abadi advising him of the Korean Air mask mandate. A copy of the e-mail is attached to Plaintiff's Complaint at Exhibit 53.

13. At all times relevant to the Complaint and Supplemental Complaint, the Korean Air Global Service Centre was, and currently is, located in Kuala Lumpur, Malaysia.

14. The Korean Air Global Service Centre handles the inquiries from English speaking customers, mainly handling reservations, ticketing, other special services and more.

15. In September 2021, as required by U.S. federal law, Korean Air imposed a mask mandate onboard its aircraft.

16. At the time of the signing of this Declaration, Korean Air does not have a mask mandate for travel on flights to and from the United States.

17. According to Korean Air records, Aaron Abadi did not:

- enter into or purchase a contract of carriage by air on Korean Air between September 2021 and the present; and
- did not travel on any Korean Air flight between September 2021 and the present.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 22 December 2023



Moon, Hyejin